

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matters of	)	
	)	
Telecommunications Relay Services	)	CG Docket No. 03-123
and Speech-to-Speech Services for	)	
Individuals with Hearing and	)	
Speech Disabilities	)	
	)	
Structure and Practices of the	)	CG Docket No. 10-51
Video Relay Service Program	)	
	)	
Internet-Based Telecommunications	)	WC Docket No. 10-191
Relay Service Numbering	)	
	)	
Petition for Waiver of Sections	)	
64.613(a)(1), 64.613(a)(2),	)	
64.613(a)(4), 64.613(b)(2) and	)	
64.623(c) of the Commission's	)	
Regulations and Request for	)	
Declaratory Ruling to Permit Providers	)	
of Direct Sign Language Customer	)	
Support Service to Access the TRS	)	
Numbering Directory	)	

**REPLY COMMENTS OF VTCSECURE**

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## **Introduction and Summary**

The comments in this proceeding highlight the important benefits that direct sign language customer support service would provide for Video Relay Service (VRS) users through enhanced functional equivalence and improved privacy and for consumers generally through significant cost savings to the Telecommunications Relay Service (TRS) Fund. The comments also bring into sharper focus the very small number and discrete nature of the issues that the Commission needs to address in granting the requested waivers and declaratory ruling. Most importantly, the comments did not identify any concerns that the Commission cannot easily address in this notice and comment proceeding.

Indeed, while VTCSecure in the petition argued that the Commission has available to it several existing regulatory categories that may be applicable to providers of direct sign language customer support services, which may vary depending on exactly how a provider chooses to offer direct sign language customer support service, the comments illustrate that the Commission need not adopt any specific classification in order to address the concerns that were identified by the commenters. The reason is simple. Unlike a VRS provider, a provider of direct sign language customer support does not obtain customer proprietary network information (CPNI) or personal information from VRS users and has no financial or regulatory reason to collect such information because providers of direct sign language customer support service are not compensated by the TRS Fund. Granting access to the TRS Numbering Directory as requested in the petition would not enable a provider of direct sign language customer support service to access VRS users CPNI or personal information. That information is

not in the TRS Numbering Directory; it is held separately by the VRS providers and the TRS User Registration Database. Nothing in the requested waivers or declaratory ruling would enable access to that information, and designating direct sign language customer support service as TRS or VRS would not provide any additional or needed protection because the TRS and VRS regulations simply are not relevant to the kind of service actually being provided. And some requirements -- for example the requirement in 47 U.S.C. § 225(d) that TRS operate 24/7 -- could create a disincentive to businesses, agencies or organizations that want to offer this new customer support service to their deaf and hard of hearing consumers.

Instead, comments confirm the Commission should focus its attention in granting the requested waivers and declaratory ruling on any requirements needed to ensure that the TRS Numbering Administrator has the information needed to enable appropriate access and accountability for providers of direct sign language customer support service and on any necessary requirement to ensure interoperability between direct sign language customer support service providers and VRS providers. The Commission could use its requirements for Interconnected Voice over Internet Protocol (VoIP) providers to obtain NANP numbers directly as an appropriate parallel for granting access to the TRS Numbering Directory, and could also require that all providers who supply routing information to the TRS Numbering Directory comply with published standards based interoperability specifications for VRS service.

Finally, the comments illustrate that the Commission should more clearly define direct sign language customer support services in order to appropriately identify the providers which are being granted access. VTCSecure suggests the Commission

define "direct sign language customer support service" to mean "a service offered to a business, agency or organization to permit consumers to use a North American Numbering Plan telephone number to engage in real time video communications using sign language with employees of that business, agency or organization regarding the services or products that business, agency or organization provides. Such service may also enable consumers to engage in audio or text communications with employees regarding such products or services so long as functional equivalence for all users is provided."

The comments all either support or provide no substantive reasons not to grant the requested waivers and declaratory ruling, and the merits of the proposal support expeditious approval of the request. In the absence of such approval VRS users must continue to access customer support services with the assistance of a VRS communications assistant since VRS provider systems by default route calls to all telephone numbers not listed in the TRS Numbering Directory to a VRS interpreter. It is only by allowing direct sign language customer support service providers to place NANP telephone numbers (and corresponding Internet routing information) for direct sign language customer support services in the TRS Numbering Directory that the Commission can provide deaf and hard of hearing users a choice, thereby increasing functional equivalence and user privacy while also reducing significantly costs to the TRS fund.

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**A. VRS Consumer Comments Were Supportive of the Petition**

1. The comments submitted by Gallaudet University supported the "premise of the petition" and agreed that the ability of direct sign language customer support service centers to call back Video Relay Service (VRS) consumers directly "is a key part of providing full functional equivalence..."<sup>1</sup> Further, Gallaudet University agreed that direct sign language customer support service providers' ability to route calls to VRS

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<sup>1</sup> *Comments of Gallaudet University*, WC Docket 10-191 (Aug. 17, 2016), at 2.

consumers through the VRS provider networks "is essential to making the concept of direct sign language call centers work in practice."<sup>2</sup> It is for this reason that VTCSecure requested the Commission issue a declaratory ruling that clarifies that calls to and from direct sign language customer support service numbers listed in the TRS Numbering Directory must be supported under the Commission's existing policies and rules.<sup>3</sup> As discussed in Part B, VTCSecure expects that the Commission would state in the declaratory ruling that the obligation to support interoperability and routing applies mutually to all providers who provision numbers listed in the TRS Numbering Directory, including both VRS providers and direct sign language customer support service providers.

2. The comments submitted by the Consumer Groups were also supportive of granting the petition and declaratory ruling, so long as the Commission declares that direct sign language customer support service is a Telecommunications Relay Service (TRS)<sup>4</sup> and requires providers of direct sign language customer support service to comply with the same consumer protection rules as VRS providers.<sup>5</sup> In particular the Consumer Groups affirmed that, in addition to allowing "more natural, efficient and effective communication between the parties,"<sup>6</sup> direct sign language customer support service would "significantly improve the privacy and security of sensitive

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<sup>2</sup> *Id.* at 3.

<sup>3</sup> *VTCSecure Petition for Waiver and Declaratory Ruling*, CG Docket 03-123 (Jul. 6, 2016) (*VTCSecure Petition*) at 18.

<sup>4</sup> See 47 U.S.C. § 225(a)(3) and 47 CFR § 64.601(a)(32).

<sup>5</sup> *Comments of Consumer Groups*, WC Docket 10-191 (Aug. 17, 2016), at 3. The Consumer Groups did not identify any consumer protection rules other than the Commission's CPNI regulations. *Id.* at 7 - 8.

<sup>6</sup> *Id.* at 4.

communications between the parties."<sup>7</sup> As discussed in Part B, VTCSecure supports the protection of deaf and hard of hearing consumers' privacy, and believes that continued application of the Commission's existing customer proprietary network information (CPNI) regulations<sup>8</sup> will ensure that protection.

## **B. The Comments of the VRS Providers Are Designed to Delay Action**

3. The VRS Providers raise a series of arguments that are largely irrelevant to the merits of the petition and request for declaratory rulemaking. While asserting that "VRS Providers recognize the benefits of direct sign language customer support services" the VRS Providers insist that a "comprehensive rulemaking proceeding" is needed and that the Commission should "not grant any waiver or any access until the rulemaking is complete."<sup>9</sup> They then proceed to lay out a laundry list of issues that are of concern to VRS Providers --- an alleged "security flaw" in the TRS Numbering Directory that allows a VRS provider to see another VRS provider's customer numbers; actions the VRS providers claim Neustar (the TRS Numbering Administrator) needs to take to facilitate VRS providers' transition to use of the Session Initiation Protocol (SIP);<sup>10</sup> concerns about customer requests to port numbers the customer doesn't own<sup>11</sup> but are unrelated to actions by providers of direct sign language customer support

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<sup>7</sup> *Id.* at 5 and note 16.

<sup>8</sup> See 47 CFR §§ 64.2001 - 64.2011 (telecommunications carriers and interconnected VoIP providers) and 64.5101 -- 64.5111 (TRS providers).

<sup>9</sup> *Response of the VRS Providers to VTCSecure's Petition for Waiver and Request for Declaratory Ruling*, CG Docket 03-123 (Aug. 17, 2016) ("*VRS Providers' Response*") at 1.

<sup>10</sup> *Id.* at 6. VTCSecure notes that it is able to provide routing information using either H.323 URIs or SIP URIs, so the resolution of the "issue" raised by the VRS Providers has no impact on the provision of direct sign language customer support services.

<sup>11</sup> *Id.* at 5 - 6.

services -- or that concern questions the answers to which are already well known and found in the Commission's regulations or can be answered in this notice and comment rulemaking proceeding; i.e. who is qualified, how the certification process works, how to add numbers to the TRS Numbering Directory, how to ensure interoperability, customer privacy and what audit rights the Commission has.<sup>12</sup> In a nutshell, the VRS Providers would have the Commission re-invent the wheel -- and thereby delay the acknowledged increase in functional equivalence and considerable cost savings to the TRS Fund that would result from direct sign language customer service support -- in a thinly veiled attempt to forestall any reduction in VRS Provider revenues from increased point to point calling.

4. First and foremost, it is important to understand who the customer is. Unlike VRS, which is provided to individual end users, direct sign language customer support service is provided to businesses, agencies and organizations that wish to offer their consumers who are deaf or hard of hearing the option of communicating directly with a customer service representative using sign language or text. Direct sign language customer support service providers do not have any access to VRS CPNI<sup>13</sup> or personal information that VRS users provide to their default VRS provider,<sup>14</sup> or any other VRS provider for that matter. The only CPNI that a direct sign language customer support service provider has access to is the CPNI of the businesses, agencies or organizations to which they provide service. That CPNI is already protected under the

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<sup>12</sup> *Id.* at 7.

<sup>13</sup> 47 CFR § 64.5103(f).

<sup>14</sup> See 47 CFR § 64.611(a)(4) (specifying personal information VRS providers must collect).



Commission's existing CPNI rules.<sup>15</sup> Any personal information provided to a customer support service representative by any caller -- whether a VRS user or any other person -- enjoys the same protection as the personal information of every other customer who contacts that business under whatever Federal and State laws apply to the business and whatever Federal and State laws apply to a provider of communications services, whether video, voice or text. There is already full functional equivalence with respect to the protection of information that a VRS user and any other user provides to customer support representatives, whether that information is conveyed to the customer support representative by a VRS communications assistant or directly in sign language or text by the VRS user.

5. Granting the requested waivers and declaratory ruling to allow direct sign language customer support service providers to access the TRS Numbering Directory would not allow those providers to access VRS users' CPNI nor obtain any personal information that VRS providers collect about them.<sup>16</sup> It would only allow those providers to obtain proper routing information for NANP phone numbers that VRS providers have placed in the TRS Numbering Directory in order to make a point to point video call.<sup>17</sup>

Granting the requested waivers and declaratory ruling would not allow direct sign language customer service support providers to access the TRS User Registration

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<sup>15</sup> See 47 CFR §§ 64.2001 - 64.2011.

<sup>16</sup> *Id.* VTCSecure also notes that the VRS Providers' admonition that the requested waiver would be "affording special treatment to a single company" is clearly erroneous. VTCSecure's petition explicitly seeks waivers and a declaratory ruling that would apply to all providers of direct sign language customer support services. See *VTCSecure Petition* at 4 and 18.

<sup>17</sup> See 47 CFR §§ 64.613(a)(1) and 64.613(a)(2) (specifying that the TRS Numbering Directory contain North American Numbering Plan (NANP) telephone numbers and appropriate Uniform Resource Identifiers (URI) that identify the Internet Protocol (IP) address of the user's device).

Database (TRS URD), which will, when operational, contain the personal information of VRS users.<sup>18</sup>

6. Unlike rival VRS providers, a direct sign language customer support service provider has no interest in exploiting the alleged "security flaw" to determine which telephone numbers are being served by which VRS provider<sup>19</sup> because direct sign language customer support service providers are serving businesses, agencies and organizations that provide customer service support and not VRS users. Further, direct sign language customer support service providers are not compensated from the TRS Fund, so they have nothing to gain by learning which VRS users are customers of which VRS provider, and no financial incentive to attempt to lure away a VRS provider's customers. All the direct sign language customer support service providers need, and all the requested waivers and declaratory ruling would provide, is access to the TRS Numbering Directory for two explicit purposes -- 1) to place their customer support service numbers and appropriate routing information in the TRS Numbering Directory to enable point to point calling to those numbers by VRS users; and 2) to obtain proper routing information to enable point to point calls back to VRS users from those customer support service numbers.

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<sup>18</sup> See 47 CFR § 64.611(a)(4)(specifying information to be submitted to TRS URD) and 47 CFR § 64.615 (rules for TRS URD).

<sup>19</sup> See *VRS Providers Response* at 5 - 6. This reverse IP to phone number "LookupTN" TRS Numbering Directory Query Interface API is not something that direct sign language customer support service providers need access to in order to provide their service, so the Commission could instruct the TRS Numbering Administrator not to provide access to it.

7. The comments did not provide any concrete evidence of a grave security risk posed by allowing direct sign language customer support service providers to have the requested access to the TRS Numbering Directory. In fact, VTCSecure previously has been granted such access and had no difficulty successfully complying with the TRS Numbering Administrator's requirements to access the TRS Numbering Directory, engaging in interoperability discussions with VRS providers, and routing calls to and from numbers VTCSecure placed in the TRS Numbering Directory.<sup>20</sup> To VTCSecure's knowledge none of the VRS providers expressed any concerns about this Commission action granting VTCSecure access to the TRS Numbering Directory when it was the Video Access Technology Reference Platform contractor.

8. As VTCSecure described in its petition,<sup>21</sup> a direct sign language customer support service provider will already have to be registered with the Commission through its Form 499 filing, which provides the necessary information to ensure that the Commission can contact a direct sign language customer support service provider and take enforcement action against a provider that violates any of the applicable Commission regulations. In addition, as VTCSecure knows from prior experience, a provider must work with the TRS Numbering Administrator and comply with the TRS Numbering Administrator's requirements in order to access the TRS Numbering Directory. As a result, the TRS Numbering Administrator will know who to contact should any issues arise and is in a position to ensure that only direct sign language

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<sup>20</sup> See *Waiver of Sections 64.613(a)(4), 64.613(b)(2) and 64.623(c) of the Commission's Rules to Permit VTCSecure and MITRE Corporation Access to the TRS Numbering Directory*, CG Docket No. 03-123, Order (rel. Nov. 23, 2015).

<sup>21</sup> See *VTCSecure Petition* at 12 - 15.

customer support service providers that actually have a customer with a valid NANP number can enter that number in the TRS Numbering Directory, thus preventing the VRS providers' bogeyman that a "criminal or disreputable entity... could wreak havoc with the VRS system."<sup>22</sup> Further, the TRS Numbering Administrator already prevents a VRS provider from modifying records owned by other VRS providers. There is no reason that the TRS Numbering Administrator would not apply the same requirements to other entities granted access to the TRS Numbering Database by the Commission, just as the TRS Numbering Administrator did when VTCSecure previously was granted access. To the extent the Commission has any concerns on this point, the Commission could look to the requirements it recently adopted for Interconnected VoIP providers who want to obtain direct access to NANP telephone numbers.<sup>23</sup>

9. Likewise, the VRS Providers' claims that additional rules are needed to address the "reliability" of the numbers that a direct sign language customer support service provider might enter into the TRS Numbering Database are a smoke screen.<sup>24</sup> A direct sign language customer support service provider must either obtain its customer's NANP customer support service telephone number directly -- as a common carrier or interconnected VoIP provider -- or through a numbering partner that is a common carrier.<sup>25</sup> Any issues regarding ownership of the number would be properly resolved by the Number Portability Administration Center and the Commission's

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<sup>22</sup> *VRS Providers Response* at 5.

<sup>23</sup> See 47 CFR 52.15(g)(3)(i).

<sup>24</sup> *Id.* at 6 - 7.

<sup>25</sup> See 47 CFR §§ 52.1 - 52.111.

regulations on number portability, making any additional resolution process unnecessary as part of the TRS Numbering Directory.

10. As discussed *supra*, paragraphs 4 through 6, access to the TRS Numbering Directory does not give a direct sign language customer support service provider access to VRS users CPNI or personal information. The requested waivers and declaratory ruling are surgical and limited in scope, but are absolutely necessary to enable a service that would provide significant benefits to deaf and hard of hearing consumers and result in substantial savings to the TRS Fund. The Commission has sought public comment and reply comments on the petition VTCSecure submitted, thus ensuring that there is "a full and fair hearing through notice and comment rulemaking" as urged by the VRS Providers.<sup>26</sup> Delaying action to consider a wide range of issues outside the scope of the petition request -- and totally unrelated to the provision of direct sign language customer support service and the benefits that service provides -- would accomplish nothing other than delaying the provision of a beneficial service to deaf and hard of hearing consumers.

11. The one issue that the VRS providers do raise that is directly relevant to the provision of direct sign language customer support service is the matter of interoperability. The Commission has already addressed this issue on numerous occasions when problems have arisen between VRS providers, and has taken action on several occasions to ensure that VRS consumers are able to complete calls using the provider of their choice and using video access technology that meets certain

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<sup>26</sup> *VRS Providers Response* at 8.

standards.<sup>27</sup> The Commission has regulations that require VRS providers to be interoperable with the Video Access Technology Reference Platform, each other, and a Neutral Video Communications Service Platform should the Commission implement one.<sup>28</sup> Interoperability is important to the success of direct sign language customer support services, because without interoperability calls fail to be completed and that would diminish the demand for direct sign language customer support. Reducing demand is directly contrary to the interests of direct sign language customer support service providers and the businesses, agencies and organizations who want VRS users to be able to reach them. As a result, a provider of direct sign language customer support service has every incentive to ensure that its network and endpoints are interoperable with the networks and endpoints of the VRS providers that serve VRS users.

12. In contrast, however, the incentives are reversed for VRS providers, because they lose a compensable VRS minute for every minute that a VRS customer spends on a direct sign language customer support service call.<sup>29</sup> VRS providers have a very real financial incentive not to be interoperable with direct sign language customer support service providers. That is why the petition seeks a declaratory ruling that it is contrary to the Commission's regulations for VRS providers to fail to complete calls to or from any number listed in the TRS Numbering Directory. To the extent the Commission

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<sup>27</sup> See, e.g., *In the Matter of Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Report and Order and Further Notice of Proposed Rulemaking (rel. June 10, 2013) at ¶¶ 6, 14 - 15, and 41 - 43 (detailing past interoperability efforts).

<sup>28</sup> See 47 CFR §§ 64.619, 64.621, 64.617, respectively.

<sup>29</sup> See *VTCSecure Petition* at note 12.

believes there might be any problem, the Commission could condition its waiver granting access to the TRS Numbering Directory on agreement by direct sign language customer support service providers to comply with any published, standards based interoperability obligations that apply to all VRS providers.<sup>30</sup> Because the VRS providers have a strong financial incentive not to cooperate, the Commission should reject the VRS providers suggestion that the Commission "compel non-VRS providers to address problems within a specific time limit"<sup>31</sup> or else ensure that any time limits with respect to resolution of disputes apply to both VRS providers and direct sign language customer support providers.

13. The VRS providers also assert that allowing direct sign language customer support service amounts to allowing any hearing user's number to be placed in the TRS Numbering Directory. While it is clear from the petition that VTCSecure is requesting waivers and a declaratory ruling on behalf of providers who are serving businesses that wish to offer direct sign language customer support service to deaf and hard of hearing consumers, the VRS providers have a fair point. To remedy that situation, the Commission can define "direct sign language customer support service" as "a service offered to a business, agency or organization to permit consumers to use a North American Numbering Plan telephone number to engage in real time video communications using sign language with employees of that business, agency or organization regarding the services or products that business, agency or organization

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<sup>30</sup> See, e.g., *In the Matter of Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Further Notice of Proposed Rulemaking (rel. Aug. 4, 2015) (proposing to incorporate published interoperability specifications for Relay User Equipment).

<sup>31</sup> *VRS Providers Response* at 5.

provides. Such service may also enable consumers to engage in audio or text communications with employees regarding such products or services so long as functional equivalence for all users is provided." The second sentence clarifies that a service which uses the same telephone number for all customer support services is permissible, provided that the service preserves consumer choice and functional equivalence as discussed in the next paragraph.

14. Finally, the VRS providers suggest that the Commission require that direct sign language customer support providers be required to use a separate telephone number for sign language support from the telephone number used for hearing consumers,<sup>32</sup> or in the alternative that the provider be required to certify that the videophone reached by the telephone number can only be used by eligible deaf and hard of hearing users.<sup>33</sup> Both of these requests should be rejected. VTCSecure agrees one hundred percent that functional equivalence requires that deaf and hard of hearing consumers must be able to choose for themselves whether to call a customer support service line directly or using a VRS interpreter. One way to do that is to provide separate telephone numbers for hearing and sign language customer support. However, that is not the only way. There exists a less expensive and equally effective way that provides complete functional equivalence and is available today through modern automated call distribution (ACD) platforms which recognize video versus audio calls and can offer video callers the option, using interactive video response systems, to press one to be connected directly to a sign language customer support representative

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<sup>32</sup> *VRS Providers' Response* at 11.

<sup>33</sup> *Id.* at 10.



or press two to be connected a customer support representative and the VRS provider of your choice. Modern ACD's also enable sign language customer support representatives to bridge on supervisors and a VRS interpreter at any time if either or both should be needed.

15. The suggestion that a provider certify that only deaf or hard of hearing consumers can use the video endpoint reached by the NANP number placed in the TRS Numbering Directory is simply inapplicable.<sup>34</sup> That requirement stems from the number being used for calls that are submitted to the TRS Fund for compensation. Direct sign language customer support is not a service that is or should be compensable from the TRS Fund. Direct sign language customer support service is designed to reduce costs to the TRS Fund by enabling deaf and hard of hearing consumers to be able to communicate directly in their native sign language, without using a VRS interpreter. So there is no reason for the Commission to restrict who can make or receive calls using the direct sign language customer service support number.

### **C. The Commission Has Authority to Adopt Any Necessary Safeguards**

16. As VTCSecure discussed in its petition, the Commission could find that direct sign language customer support service is a "telecommunications relay service" or is one or more of several other services for which the Commission has established requirements.<sup>35</sup> However, there was no consensus in the comments regarding which

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<sup>34</sup> *Id.*

<sup>35</sup> See *VTC Secure Petition* at 12 - 15.

definitions applied.<sup>36</sup> That lack of consensus should not trouble or delay the Commission for the reasons discussed in Part B. The reality is that direct sign language customer support service providers do not access VRS users' CPNI or personal information, so designation as a TRS provider may be unnecessary and could create impediments to providing the service. Direct sign language customer support service providers are simply providing an alternative, and more effective and efficient, way for deaf and hard of hearing users who chose to do so to communicate with businesses, agencies or organizations. The Commission possess adequate authority, either directly or through ancillary jurisdiction,<sup>37</sup> to adopt any safeguards the Commission deems necessary to enable this valuable service to be expeditiously provided.

### **Conclusion**

For the reasons set forth above the Commission should issue the requested waivers and Declaratory Ruling without delay.

Respectfully submitted,

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<sup>36</sup> *Compare Comments of Consumer Groups* at 7 ("Consumer Groups are not addressing Petitioner's assertion that its proposed... service meets the definition of TRS....") and *VRS Providers' Response* at 2 and 8 (proposed service is not TRS).

<sup>37</sup> *See VTCSecure Petition* at 15.